

## **Strategy for Building a Targeted Site Efforts (TSE) Initiative**

### **What are TSEs?**

The Targeted Site Effort (TSE) Initiative is an outgrowth of the Lessons Learned from the first round of RCRA Brownfields Prevention pilots. It recognizes that there are many sites that are close to meeting their potential for cleanup and redevelopment, but that are unable to reach that goal for a variety of reasons. Sites dealing with issues such as a lack of community consensus, accurate information or other barriers that can be addressed with small-scale, targeted activity are strong candidates for TSE. These efforts may “jump-start” activity at a facility to move it to the next level of cleanup, consensus or appropriate closure. If the site is important to the community, and/or the EPA Regional Office considers it to be significant, TSE may be used to infuse a quick dose of attention and a small amount of contracting support that can yield a significant environmental improvement in a short time-frame.

### **How are they different from RCRA Brownfields (BF) Prevention Pilots?**

While the RCRA BF Prevention Pilots and RCRA Showcase Pilots provide intensive collaboration around RCRA sites, TSE’s are designed to provide short-term, yet focused, attention, with a results-driven approach. Envisioned as problem-solving assistance, TSE’s will be managed by each Regional RCRA program, with help from the RCRA Brownfields Prevention workgroup.

### **What should I look for when nominating a facility for TSE consideration?**

- The TSE will test innovations that may be easily transferred to other RCRA sites.
- TSE goal is to help move RCRA properties from contamination to cleanup and reuse. At the end of one year, TSE will be evaluated to determine whether it should be continued at the same level, discontinued, expanded, or otherwise integrated into daily RCRA site work.
- The TSE should be implemented consistent with EPA’s Draft Public Involvement Policy (65 FR 82335). Regions, State and local governments, and other identified stakeholders of the public should be involved in the process. States should be consulted by EPA before choosing the TSEs in those States.
- The TSE should be streamlined, easily accessible and non-bureaucratic.

### **What are my obligations if my nominated sites are selected as TSEs?**

- Regions will be responsible for managing contractor hours to meet their objectives and be willing to report on results and successes in a timely fashion.
- A tool-kit featuring innovations that worked in the TSEs will be distributed to all EPA Regions, along with a report on all of the TSE's that were completed within one year.

### **What restrictions may apply, if any, to activities or sites I want to pursue as a TSE?**

- TSE contractor support or money should not be used by a facility to conduct or perform a particular function that is currently required for the facility under any RCRA obligation, whether by statute or regulation, permit, or order. However, it may be appropriate to use TSE contractor support or money to complement or supplement such obligations.
- High, medium, and low priority sites may be considered for this initiative.
- TSE sites can also be a part of the RCRA Showcase Pilots. As appropriate, Regions can integrate their TSE and RCRA Showcase Pilot submittals to Headquarters (e.g., proposals and reports.)
- While the TSE Initiative was not designed for sector-wide efforts, we might consider supporting a site, such as a metal-finishing facility, which could serve as a model for similar facilities within that sector.

### **How will we get there from here?**

This strategy was developed by a RCRA Brownfields workgroup spinoff, consisting of EPA Headquarters, Regional, and State staff. The workgroup team will manage implementation of the TSE initiative.

Workgroup members will be on-call to serve as mentor, problem-solver, and partner, to each Regional lead for a TSE.

### **What will be needed of the Regions for each TSE?**

- Upon submittal, a brief initial project summary (one to two pages) with a focus on potential accomplishments, such as how the TSE will measure success.
- If accepted as a TSE, a progress report, if appropriate, and a short final report (one to two pages) describing projects, successes, and lessons learned.

## **How will we measure success?**

The concept is to provide some resources to boost or jump-start a languishing project.

- Each Region will work with its TSE recipients to identify their own measures of success, including, for example, movement towards the attainment of the environmental indicators.
- The accomplishment could be a faster or better clean-up.
- Other measurable outcomes might be reaching consensus on a decision, getting buy-in from a diverse community group, or by streamlining lengthy State, Federal and local government processes.

Examples:

- By serving as a catalyst and providing some assistance for a stakeholder meeting, the Region was able to help achieve consensus on next steps and potentially save x months of negotiation time.
- By providing outreach materials, the Region was able to secure the community participation in the redevelopment planning process and thus, enhancing the cleanup process. This resulted in the earlier approval of a development plan that allowed cleanup activities that incorporate future use plans. Without this effort, the process would have taken 3-5 years.

## **Contractor Support**

OSPS and OSW have each contributed \$50, 000 in contractor support for this fiscal year. It will be divided among Regions interested in participating, with a goal of providing no more than \$10, 000 in contractor support to each Region. Regions may divide their allotment among up to three sites, or may focus on only one or two sites. If a Region should decide not to participate, or not utilize all of the \$10,000 allotment, left-over support will be divided among Regions who can demonstrate additional need.

## **How will the contractor support be used?**

There are a variety of activities that contractor support could be focused on for a TSE. Some are listed below. Generally, it will be the contract statement of work that limits the type of activity. OSW and OSPS have different limitations on how their funds can be spent; some of this is described below. Upon receiving TSE proposals, OSW and OSPS will determine which office will support each TSE. If there is a question about authorities for a specific project, contact your Office of Regional Counsel, OSPS or OSW for clarification. The TSE funds are expected to support TSEs both in authorized and unauthorized States.

OSW resources will generally be used at the 1,714 RCRA sites that are currently designated as being in the Corrective Action Government Performance and Results Act (GPRA) universe.<sup>1</sup> Funding will be sent to the Regions to be put in their own contracts or other appropriate funding mechanisms. Depending on the specifics of the contract, these funds can be used for outreach activities or investigation/cleanup activities authorized by RCRA. Potential projects may include:

- Site assessment on portions of property not otherwise funded (no owner/operator around)
- Limited amount of sampling to document achievement of the corrective action Environmental Indicators<sup>2</sup> (EIs) thereby increasing potential developer or lender interest in the site
- Public meetings, stakeholder meetings, developing outreach materials
- Alternative Dispute Resolution assistance

OSPS resources will be put in a Headquarters contract. OSPS's resources could be deployed for:

- Development of outreach materials or workshops to inform the community about redevelopment plans and future uses of the property and the appropriate cleanup
- Support of public meetings to address public concerns about assessment and cleanup decisions

## **Timing**

Regions need to notify EPA Headquarters of selected sites by July 30, 2001. All monies should be obligated by September 28, 2001. A "tool-kit" highlighting the approaches used and accomplishments attained will be developed at the end of the process, likely Spring, 2002. At that point, it will be determined whether TSEs should be discontinued, expanded or reworked and promoted nationwide, with appropriate recommendations to Senior OSWER management.

## **Contacts**

See attached list of Regional, OSPS, and OSW coordinators.

## **Tentative Project Schedule**

---

<sup>1</sup> The 1,714 RCRA sites in the Corrective action GPRA Universe are the sites that the corrective action program is generally focusing on as a priority.

<sup>2</sup> There are two Corrective Action Environmental Indicators; controlling current human exposure and controlling the migration of contaminated groundwater.

2001

- 5/1-7/30 - Regions gather site/project possibilities
- 7/30 - Regions select sites - send HQ site summaries
- 7/30-9/28 - OSW and OSPS allocate contractor funding to Regions
- 9/1-12/30 - Sites conduct the project/task that the TSE resources will support

2001

- 1/02-3-02 - Sites report back results (sites/regions)
- 3/02-4/02 - Summary Report drafted (HQ)